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August 7, 2023

By ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd., et al.*, No. 1:22-cv-02943 [rel. 1:23-cv-04774] (PAE) – Frontier’s Motion to File Exhibits 1-3 to Its Response to Defendants’ Proposed Guarantee, and the Declaration of Josh Wetzel, Under Seal

Dear Judge Engelmayer:

We represent Frontier Airlines, Inc. (“Frontier”) in the above-captioned proceeding. Per the Court’s August 3, 2023 Order (ECF No. 113), Frontier is filing tonight its response to Defendants’ proposed guarantee (the “Guarantee Response”).

Exhibits 1 and 2 to the Guarantee Response contain the same Defendants’ confidential information that the Court previously ordered could be filed under seal as part of Frontier’s reply papers in support of its application for a preliminary injunction. *See* ECF Nos. 88, 94. Frontier respectfully requests leave to file Exhibits 1 and 2 with the confidential information redacted on the public docket.

Exhibit 3 to the Guarantee Response is a balance sheet containing non-public financial information of Defendants’ proposed guarantor. Likewise, the Declaration of Josh Wetzel, Frontier’s Chief Accounting Officer, contains Frontier’s financial analysis of that balance sheet. Frontier respectfully requests leave to file Exhibit 3 and the Declaration of Josh Wetzel entirely under seal, given that all of their substantive content concerns the confidential information of Defendants.

Very truly yours,



Eric B. Fisher